

DEC 04 2020

JULIA Q. DUDLEY, CLERK  
BY: *[Signature]*

DEPUTY CLERK

20, 2020

IN THE UNITED STATES DISTRICT  
COURTS FOR THE WESTERN DISTRICT  
OF VIRGINIA  
Alexandria Division

Marquis R. Wilson  
Plaintiff,  
VS

Civ Action No. 7:20cv00533  
Harold Clarke, Barry Marano, et al.,  
Defendants

Affidavit of Marquis Robert Wilson

Dear Sir or Madam

1. I am writing these statements to explain how the VDOC's, and it's employees located at Buckingham Correctional Center (BKCC) and other multiple locations have failed to protect me, and have denied me access to medical treatment and to other accommodations /services being allowed to other inmates who have the same or similar disabilities as I.

2. I base the information contained in this affidavit on personal knowledge and records maintained from my incarceration here at the VDOC.

3. On or about the date of May 19, 2016 I was diagnosed with Bilateral Sensorineural hearing loss by Chesapeake Bay ENT, that later prompted me to file a lawsuit against Mr. Barry Marano the Statewide ADA Coordinator.

4. During the course of the lawsuit and my incarceration while in the custody of VDOC I have been attacked by both Correction Officers and inmates.

5. I now suffer from PTSD, TBI, Memory loss, Refractory migraines, and Photophobia.

6. In one incident an officer by the name of C/O Fowler and Sgt. Edmond beat me while shackled in full restraints.

7. I have been put in a Coma.

8. In another incident on or about the date of March 10, 2018 I was attacked by an inmate in the present of Sgt. Peeples whereas Martinez Robertson #1195614 threw a cup filled with hot grease, urine, magic shave, and other chemical agents in my eyes which left me with burns and damaged eyes.

9. I have been transferred six times within six months to institutions which are not equipped to handle those with my type of disabilities.

10. All I really want is to be treated for the injuries sustained, ie., EEG, tinted glasses, hearing aids, TTY phone and to be transfer to a facility that help those with my disabilities and for those responsible to be held accountable and brought to justice and for the courts to award me any damages they consider fit.

11. I understand that Mr. Barry Marano believes that I need the 19" t.v. as disability accommodations which is not true. The truth is that Mr. Marano has lied to the courts and to his superiors.

12. The Samsung 19" t.v. should not be allowed due to its many functions.

13. On or about June 28, 2016 my request for certain accommodations was denied by staff but for not the real reason explained to the courts.

14. To my knowledge and belief Lt. Robinson as building security head of building 4 during the time that the 19" t.v. was introduced into Greenville Correctional Center and was briefed and had first hand knowledge of the Samsung t.v. capabilities and chose to disregard concerns as security department head of building 4.

15. To my knowledge and belief I, Mr. Wilson filed a lawsuit which other inmates believed threatened their auxillary aids.

16. I was targeted!

17. To my knowledge and belief Defendants L. Talbot and Mr. Barry Marano failed to protect me.

18. Linda Talbot ADA Coordinator/PREA for Greenville should have been notified of all incidents involving all ADA inmates and equipments but chose to disregard and neglect her duties contributing to my injuries.

19. Lt. Coleman was and still is building 6 security head at GCC, while plaintiff was housed on S-2 cluster during which more than several employees involved were walked off on his watch from building 6 due to bringing unauthorized electronic devices amongst other items in which can be linked to multiple security concerns.

20. Lt. Martin, Department head knew of devices and failed to report said security concerns which contributed to injuries I sustained at the hands of those plotting to harm me.

21. To my belief and knowledge I am one of the only ones at GCC at the time who had a doctor sign off on:

a. 19" and 15" television

b. DVD player

c. Noise isolation headphones

d. Pro connect

e. Streamer device for hearing aids

Due to my disabilities and injuries I sustained that handicapped me.

M. Wilson

7 [Signature] 1435580  
Affiant

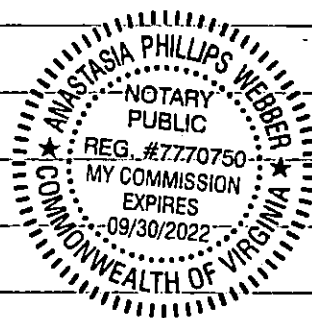
Sworn and subscribed to before me, a Notary Public, in and for  
the State of Virginia, this 23<sup>rd</sup> day of Nov. 2020

Notary Public

Lt. A. Webb

11-23-2020

Thank You



Also during my previous lawsuit the question was did I  
complete Supplemental Summary Judgement, and the answer  
is "YES"! I gave the legal documents to (Captain Die) who destroyed  
them due to an argument we had whereas he threatened my life  
at Pocahontas State Correctional Center which is the same prison  
where I was attacked by officer Fowler and Sgt. Edmond.